



Coventry & Warwickshire
Chamber of Commerce
Training
Training | Skills | Growth

Equality & Diversity Policy Statement & Policy

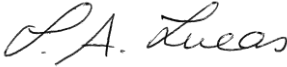
Equality & Diversity Policy Statement

CWCT is committed to promoting equality and diversity, providing an inclusive and supportive environment for all. This shall mean fairness for all: the recognition, development and use of everyone's talents. This fairness will run through recruitment, selection, training, promotion, specialisation and career development.

Through our Equality and Diversity Policy we will strive to ensure that:

- ✓ Individuals are always given equality of opportunity. No individual will be discriminated against on the grounds of age, sex, gender, colour, marital status, race, nationality or ethnic or national origin, religion, sexual orientation, Trade Union membership, hours of work, disability. Ex-offenders will be considered on their merits as with other learners, though with any special criteria taken into account.
- ✓ By adopting a programme of action, we will seek to eliminate unlawful or unfair discrimination and promote positive action and ensure that everyone has a responsibility to adopt and embrace the policy.
- ✓ We are committed to improving the economic prosperity of the area, a region rich in cultural diversity, and believe that through diversity, as an employer and a provider of learning and development, we can ensure inclusion and fair treatment.
- ✓ As an employer we will ensure recruitment, selection, appraisal, training and promotion of staff is fair.
- ✓ We are committed to effectively promoting equality and diversity and tackling all forms of discrimination.
- ✓ We will seek to ensure that all learners are provided with effective support to enable them to fulfil their potential and in so doing we will narrow any differences there may be in the achievement of different groups of learners.
- ✓ We are committed to safeguarding young people and vulnerable adults, providing a working and learning environment which enables individuals to flourish.
- ✓ We will ensure that learners enjoy and achieve, feel safe, are able to make informed choices about their health and well being, empowered to make a positive contribution to their community and achieve economic well being.

As a Provider of training and development, we will ensure open access to learning where individuals are recruited on the basis of merit with progress and achievement monitored to ensure equality of opportunity. **CWCT** is committed to monitoring and annually reviewing this policy to make it fully effective.

Signed: ... 
Sally Lucas, Executive Director

Date: 1st August 2019

1. Policy

- **CWCT** recognises that discrimination and victimisation is unacceptable and that it is in the interests of the Company and its employees to utilise the skills of the total workforce. It is the aim of the Company to ensure that no employee or job applicant receives less favourable facilities or treatment (either directly or indirectly) in recruitment or employment on grounds of age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation (the protected characteristics).
- Our aim is that our workforce will be truly representative of all sections of society and each employee feels respected and able to give of their best.
- We oppose all forms of unlawful and unfair discrimination or victimisation. To that end the purpose of this policy is to provide equality and fairness for all in our employment.
- All employees, whether part-time, full-time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.
- Our staff will not discriminate directly or indirectly, or harass customers or clients because of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation in the provision of the Company's goods and services.
- This policy and the associated arrangements shall operate in accordance with statutory requirements. In addition, full account will be taken of any guidance or Codes of Practice issued by the Equality and Human Rights Commission, any Government Departments, and any other statutory bodies.

As an employer, **CWCT** will operate equality and diversity policy in the recruitment, selection, appraisal, training and promotion of staff at all levels. Selection criteria and procedures will be monitored and reviewed to ensure that individuals are recruited and selected on the basis of their relevant merits and abilities by ways that can be shown to be not discriminatory. All employees will be afforded the opportunity to undertake

training appropriate to their present posts and future aspirations. It will use positive action to promote equality of access throughout its employment provision.

As a provider of training and development, **CWCT** will offer open for access to its learning opportunities. Selection criteria and procedures will be monitored and reviewed to ensure that learners are recruited on the basis of their relevant merits and abilities. Progress and achievement will be subject to monitoring and review to ensure that there is no discrimination.

CWCT will:

- Ensure that people are treated solely on the basis of their abilities and potential, regardless of race, colour, nationality, ethnic origin, religious or political belief or affiliation, trade union membership, age, gender, gender reassignment, marital status, sexual orientation, disability, socio-economic background, or any other inappropriate distinction.
- Promote diversity and equality for learners and staff and value the contributions made by individuals and groups of people from diverse cultural, ethnic, socio-economic and distinctive backgrounds
- Promote and sustain an inclusive and supportive learning and work environment which affirms the equal and fair treatment of individuals in fulfilling their potential and does not afford unfair privilege to any individual or group
- Ensure that different groups of learners, whether that be in terms of gender, ethnicity or disability, are provided with effective support so that they can achieve on par with all learners
- Treat part time staff fairly and equally and wherever reasonable and practicable, promote flexible working arrangements
- Challenge inequality and less favourable treatment and wherever practicable
- ensure individuals experience a level playing field for achieving opportunities
- Promote greater participation of under-represented groups of learners and staff by encouraging positive action to address inequality
- Promote an environment free of harassment and bullying on any grounds in relation to all staff, learners and visitors

The Company believes that all employees and learners have a right to be treated with dignity. Harassment is unwanted behaviour, which a person finds to be intimidating, upsetting, embarrassing, humiliating or offensive. Sexual harassment in or related to the workplace and training environment will not be permitted or condoned – employees and learners have a right to complain about it should it occur.

The Company is aware of and will observe the requirements of the Disability Discrimination Act 1995 and recommendations within the associated Code of Practice. **CWCT** will not treat anyone who is disabled less favourably for something which relates to the disabled person's disability, and will always endeavour to make reasonable adjustments where in the alternative the disabled person concerned will be at a substantial disadvantage in comparison with persons who are not disabled. A published Disability Statement summarises provision for anyone with special needs.

Furthermore, the Company recognises that employees of all racial groups have a right to equal opportunity. This Policy will apply whenever the Company is recruiting, transferring, promoting, assessing performance, disciplining or offering training or other opportunities for advancement.

If employees or learners of a particular race or sex are significantly under-represented in a certain type of job and training, special encouragement and training may be given to that group in order to develop their potential. This special treatment will not extend to affecting job selection decisions.

It is recognised that the principal responsibility for providing equal opportunities in employment and training rests with the Company. Each employee, learner and Line Manager is required to be familiar with and to implement this Company Policy and is urged to comply at all times not only with the letter but with the spirit of Equal Opportunity Legislation and Codes of Practice. The Company's view is that it is in everyone's interests that the working environment encourages harmonious, respectful and dignified working relations between races and sexes.

It is the responsibility of each Line Manager within the Company to ensure that his or her treatment of employees and learners, and the decisions and approach taken within their own sphere of operations are devoid of discriminatory practices.

The individual responsible for overseeing and checking upon satisfactory implementation of this Policy is the Executive Director, who is empowered to investigate thoroughly, and if appropriate redress, any identified or claimed discriminatory incident or practice.

The scope of this policy encompasses equality based on:

- age
- disability
- race, colour, nationality, national or ethnic origin

- gender or gender identity
- marital or civil partnership status
- sexual orientation
- religion, religious or political beliefs
- pregnancy and maternity
- caring responsibilities for children, family or dependants
- social class, income or housing circumstances
- trade union membership or trade union activity
- any other status identified within the European Convention of Human Rights

CWCT is committed to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
- advance equality of opportunity between people from different groups.

This involves considering the need to:

- remove or minimise disadvantages suffered by people due to their protected characteristics
- meet the needs of people with protected characteristics
- encourage people with protected characteristics to participate in activities where their participation is low
- foster good relations between people from different groups. This involves tackling prejudice and promoting understanding between people from different groups

2. Purpose of the Policy

2.1 The purpose of this policy is to establish clear guidance regarding equality and to establish key principles, structures and monitoring arrangements for **CWCT**. The guidance will be applicable to all employees and learners, contractors, volunteers and visitors.

2.2 **CWCT** will regularly measure, review and reinforce the effectiveness of the policy through:

- Self-Assessment and Development Planning
- Employer and Learner surveys
- Data analysis
- Collecting and disseminating examples of good practice
- Investors in People Review process and annual Management Review

3. Scope of the Policy

In ensuring that this policy is fully effective and that all employees and learners are fully committed to it, **CWCT** undertakes to work locally in partnership with employers, employees and learners in general, in its development and implementation.

4. Key Principles

CWCT believes that all forms of prejudice and discrimination are unacceptable.

5. Responsibility for Implementation

The Executive Director has ultimate responsibility for the effective implementation of the policy. The policy will be reviewed at least annually to ensure it remains commensurate with the law and best practice. The Operations Director with responsibility for equalities issues will, as Chair of the Equality and Diversity Focus Group, oversee the implementation of this policy.

The Equality and Diversity Focus Group is responsible for monitoring the implementation of the policy and the action plan, reporting on the progress made. The Equality and Diversity Champion will take responsibility for cascading best practice across all areas of the business.

6. Liability

All members of staff remain personally responsible for ensuring that they act within the law. **CWCT** management team is responsible for ensuring that members of staff perform their duties in a lawful manner and that proper training and support is provided accordingly.

7. Action Planning

Staff Issues

i. Recruitment

Recruitment and selection procedures will be reviewed and updated in the light of emerging equalities legislation and guidance offered to all relevant staff. Annual data monitoring will be undertaken in relation to recruitment, selection, appraisal, promotion, disciplinary cases, grievances and harassment in respect of gender, age, disability and race/ethnicity. Areas of identified inequality will be addressed.

ii. Training

All employees undertaking recruitment and selection will be trained in equality issues. Equality and diversity training will be included in induction sessions and induction packs for all newly appointed staff. Managers with responsibility for staff will receive training in equality and diversity matters, including the relevant law and their duties. Managers are responsible for ensuring that their staff attend equality and diversity training as per the company Training and Development Plan.

Learner Issues

i. Monitoring

Regular monitoring will be undertaken in respect of gender, age, race/ethnicity and disability in relation to applications, course documentation, retention, progression, achievement, destination, complaints, appeals and harassment cases in order to help identify and thus address any unjustified less favourable treatment and/or inequality.

ii. Recruitment

CWCT welcomes applications from potential learners irrespective of background. Specific positive action measures may be put in place for particular groups that are underrepresented, such as disabled and those from disadvantaged socio-economic backgrounds.

iii. Widening Participation

CWCT will maintain and review its actions towards securing widening participation seeking to recruit and support learners from disadvantaged socio-economic, black and minority ethnic and other diverse backgrounds.

iv. Teaching, Learning and Assessment

All learning will encompass equality and diversity objectives. All staff will be offered guidance in relation to working with learners from diverse backgrounds, including disabled learners and those from black and minority ethnic communities. Training will include anti-harassment and anti-bullying awareness. Subject development will take account of equalities issues where relevant; specifically in relation to race, cultural and religious diversity, disability, gender and sexual orientation.

Reasonable adjustments will be made to assessment methods to meet the needs of disabled learners and those from diverse ethnic and religious backgrounds. Language support may be offered to learners whose first language is not English.

Age

CWCT recognizes that people can develop throughout their lives and that an individual's life experiences add value to their role as a member of the community and work force.

CWCT will actively promote and support achievement for people of all ages. We will promote positive images of achievement by people of all ages that recognize and celebrate the knowledge and experience, which people bring to their learning throughout life.

Disability

CWCT will make reasonable adjustment to arrangements, facilities, support in order for a disabled person to participate in the recruitment and selection process or learning experience. This includes potential staff and learners with physical or mental disabilities.

CWCT will:

- Value positively learners' achievements and support them to realize their full potential
- Assess all potential learners or job applicants on their individual merits and their ability
- Provide an inclusive learning experience which is challenging, intensive and adds value
- Provide adjustments to enable disabled staff to work and develop in their post
- Encourage and enable learners to progress and to achieve appropriate outcomes
- Make reasonable adjustments to ensure learners with disabilities are supported
- Celebrate success of learners and staff

Race

CWCT will seek to create a working and learning environment based on positive relations between members of different racial groups. The aim is to create a positive inclusive ethos with a shared commitment to respecting diversity and difference, and to encouraging good relations between people of diverse backgrounds.

CWCT will:

- Provide training and support for staff
- Consult with staff and learners from different racial groups
- Provide diverse images in any material which it produces for learners and staff
- Raise the awareness of learners
- Assess the impact of its policies on learners and staff from different racial groups
- Monitor the recruitment and progress of learners

Gender

CWCT's aim is to create a supportive environment for men and women, which is conducive to excellent practice in training and employment.

CWCT will:

- Take positive action work towards creating equality of opportunity in all areas of **CWCT** activity for learners and potential learners, employees and potential employees
- Encourage applications from potential learners and potential employees into non-traditional areas of work or learning
- Work towards addressing gender imbalance in some areas of work and/or learning.

Religion

CWCT respects the rights of individuals to hold different religious beliefs.

CWCT will:

- Work to create a learning environment, which is welcoming and supportive of people of all religious beliefs
- Respect and, where necessary, provide for the practices, which support the religious beliefs of learners and/or employees

Sexual Orientation

CWCT believes that a person's sexuality does not generally have any bearing on their ability or suitability for employment or learning opportunities

CWCT will:

- Encourage an openness of approach to all potential job applicants and learners
- Raise awareness and understanding of staff and learners
- Respect the sexual orientation of all employees and learners

8. Equality Principles within Employment

CWCT embraces diversity in all of its aspects and aims to employ a work force, which reflects, at every level, the community, which it serves.

In seeking to achieve a balanced workforce at all levels, **CWCT** will ensure that no employee, job applicant or candidate for promotion will be disadvantaged, or treated less favourably because of conditions or requirements that are not related to the job. Reasonable adjustments will be made to arrangements and premises to ensure equal access for employees or potential employees who are disabled.

9. Equality Principles within the Teaching and Learning

CWCT will aim to make courses accessible to as wide a range of learners as possible via increased flexibility, modularization of programmes, open/distance learning courses and outreach provision in accordance with the philosophy and practice of inclusive learning.

CWCT will provide impartial careers guidance and counselling to all learners and ensure that learners receive appropriate learning support to meet their individual needs.

Support to learners will be available through a nominated Training Advisor (Assessor). Specific support will be provided where reasonably practicable to enable a learner with a difficulty /disability to use particular facilities or services.

Trainers will embed the policy throughout delivery, ensuring learners' knowledge and understanding of equality and diversity is stretched and challenged at all opportunities. Themed weeks on topical matters, including those relating to equality and diversity, will take place throughout the year.

Training Advisors (Assessors) will include a discussion on an aspect of equality and diversity during a quarterly progress review meeting. This will be documented on the review.

Access to Assessment

CWCT will ensure that all learners for assessment under the provision of its nationally accredited qualifications are treated fairly and on an equal basis.

Open access is provided to ensure, wherever feasible, equality of opportunity regardless of a learner's gender, age, racial origin, religious persuasion, sexual orientation or disability.

Learners with literacy and numeracy needs will not be prevented from accessing qualifications at an appropriate level.

10. Complaints

Staff

Any member of staff may pursue any grievance relating to their employment via the Grievance Procedure. This is defined in the Staff Handbook. Staff who experience bullying or harassment should follow the procedure outlined in the Harassment Policy.

Learners

Learners may pursue any complaint via the Complaints Procedure. The Harassment Policy should be utilised for any act of harassment or bullying. This is stated in the Handbook issued at the commencement of learning and is available from the Executive Director on 024 7623 1122.

11. Supporting Policies and Procedures

- Disability Statement
- Staff Handbook
- Learner Handbook
- Statement of Service
- Complaints procedure
- Safeguarding Policy
- Safeguarding Statement

12. Monitoring and Evaluation

CWCT undertakes to conduct comprehensive and effective monitoring of all aspects of staffing and learning programme participation.

CWCT will monitor all learners and potential learners in order to inform the setting of targets and the measurement of our progress in achieving them. In particular the age, gender, disability and racial group profile of learners in:

- Applications to programmes
- Retention and achievement rates
- Satisfaction levels
- Complaints

Equality and Diversity is given full consideration during the annual Management Review. The progress of the policy is evaluated and where necessary re-drafted or amended in order to progress the implementation of the policy.

13. Delivering Our Promise

CWCT will ensure that:

- Staff, learners and their employers are aware of our policy
- Staff, learners and their employers are aware of the value placed upon equality of opportunity and that action will be taken in the event of any breach of the policy
- Staff have access to comprehensive information, which assists them to plan, implement and monitor actions to carry out their responsibilities under the policy
- We will also ensure the **CWCT's** publicity materials present appropriate and positive messages about equality and diversity

14. Promotion

CWCT will promote the policy through visual displays around the training facility; in electronic materials (Guide to Apprenticeships for learners and employers); on its website; in curriculum delivery; progress review meetings (scenario discussions).

15. Summary

CWCT's Equal Opportunities Policy implementation is the responsibility of all staff. It is integral to the business strategy and all facets of the organisation will adopt and promote this policy. No individual employee will amend this policy.

Those who hold management, supervisory or other senior positions within the organisation have additional responsibilities to ensure the effectiveness of its application and the commitment of all staff and others to it. The Board of Directors will give full backing to this policy and will support all those who endeavour to carry it out. This policy will be reviewed as often as appropriate.

Code of Practice – The Policy in Action

1. Introduction

Discrimination is often the result of lack of understanding or consideration for a particular group. This passive rather than active discrimination, which often manifests itself in a lack of encouragement or a reluctance to accept changes designed to move towards equal opportunities, is as unacceptable as more overt forms of discrimination. This code of practice aims to combat both active and passive discrimination by providing everyone in the organisation, employees and learners, with a framework into which to fit all employment and training practices.

2. CWCT as an Employer

Recruitment

When recruiting staff, it is generally unlawful to discriminate either in favour or against a particular group. It is permissible to encourage applications from a group historically under represented for certain posts but after encouraging such applications each candidate must be treated strictly on merit. It is not lawful to exercise discrimination in selection to achieve a quota.

CWCT gives due consideration to the following areas:

2.1 Advertising

Notices must carry the words:

'CWCT is committed to equality of opportunity'

The wording of any advertisements must not exclude, or imply the exclusion or discouragement of particular groups. Rather they should be designed to appeal to a wide a spectrum as possible, and be advertised as widely as possible using such outlets as community based newspapers where applicable.

2.2 Short Listing

All short listing must be carried out taking due regard to the job description required. Short listing must be based upon the information contained within the application. All candidates need to supply a completed **CWCT** application form.

2.3 Interviewing

Suitably qualified and experienced individuals able to assess and evaluate applications must conduct staff interviews. Where expertise is not available additional members of staff may be co-opted to the process.

The criteria for each selection should apply equally to each candidate and be in accordance with the job description.

2.4 Appointment

A file must be established for each staff vacancy, containing vacancy notification, application forms, completed short list proforma (where applicable), interview schedule and associated documentation.

The file must then be archived for a minimum of 6 months for monitoring purposes.

3. CWCT as a Provider of Training & Development

The criteria for accepting learners should be whether or not it is possible to provide the type of learning required by the learner and whether the learner is considered capable of achieving the desired outcome. It is not permissible to reject a learner on the grounds of national, ethnic origin or gender, disability or where the potential learner is an ex-offender. Applications must be dealt with consistently, and that staff involved in the recruitment process should appropriate training and guidance.

Applications should be recorded and reasons for rejection detailed on file for a maximum of 6 months.

4. Marketing

Marketing methods used across all aspects of **CWCT** operations must reach both gender, all national/ethnic origin and people with disabilities and as a consequence do not unjustifiably narrow the pool of potential learners.

The following points will be considered:

- a. Marketing efforts should include local community based groups, publications aimed at women, people with disabilities and ex-offenders as well as the usual referral agencies.
- b. Direct personal contact with the above organisations is an effective means of communicating **CWCT's** commitment to its equality and diversity policy.
- c. Production of effective recruitment literature, which does not perpetuate gender, national/ethnic origin or disability, stereotypes and promotes positive self-image of such groups.
- d. No reliance upon 'word of mouth' or unsolicited approaches that may favour one group.
- e. Do not give preference to potential learners who are friends and relatives of existing learners or employees.
- f. Ensure that all staff are aware of equal opportunity issues in marketing and instruct them that all eligible people are to be considered, and that it is unlawful to indicate a preference for a particular racial group or persons of a particular gender, marital status or disability.

5. Learner Interview and Creation of Learner Learning Plans

CWCT is committed to ensuring all learners receive objective information, advice and guidance relating to learning and employment opportunities. Staff involved in this activity will be assessed for their competence and will engage in ongoing personal development to maintain skill levels.

All learners will receive fair and equitable treatment from the commencement of contact with **CWCT**. Learners will receive a service that is:

- Impartial
- Confidential
- Need focussed
- Equal
- Open and transparent
- Accessible

In the process of creating a learning plan, staff will assess, test, discuss and make objective judgements on learner needs. All of these processes have the potential to involve the use of stereotype assumptions about the learners or the use of testing and assessment procedures that are biased against certain learner groups.

The following points will be considered when creating learning plans:

- a. Take all available options into consideration for all learners, and that training and employment opportunities are not classified in a particular way which may imply exclusion of a particular group. Reasonable adjustment should be made to ensure all available training options are open to learners with disabilities.
- b. Staff responsible for creating learning plans will receive training and guidance in equality and diversity issues.

Assessment tests will be regularly reviewed by **CWCT** staff to ensure that they contain no bias that would put particular groups at a disadvantage.

6. During Learning

Equality and diversity does not cease to be an issue once a person has been accepted on to a learning opportunity. It is important to ensure that all learners receive equal treatment when they are in learning and that they have access to all relevant parts of the programme.

The following points will therefore be considered:

- a. Equality and diversity will be a standard part of the learner's introduction to their development learning programme. Learners will not be dissuaded from taking a particular form of learning or employment because they might have difficulty on account of their gender, national/ethnic group, religious beliefs or disability.
- b. Staff, responsible for placing learners in learning and employment, undertake regular training and receive guidance in equality and diversity issues.
- c. The appropriate line Manager will promptly and firmly deal with any incidents of discrimination.
- d. Particular learner needs, such as language tuition or special help or equipment will be provided wherever possible.

7. Sponsor Companies

CWCT's intention is to promote and provide learners with comfortable working conditions, free from discrimination.

- a. Staff responsible for co-ordinating sponsor companies will have received training and guidance in equality of opportunity and diversity.
- b. Staff are responsible for ensuring sponsor companies are aware of and committed to working in accordance with **CWCT's** Equality and Diversity Policy.
- c. Staff are responsible for ensuring that any incidents of discrimination are dealt with firmly and promptly.
- d. Staff are responsible for ensuring that employment/work experience opportunities are available to all learners regardless. Records are maintained of interviews attended and outcomes for monitoring purposes.

8. Premature Exit / Rejection

The premature exit of learners or the rejection of learners from learning opportunities is carefully recorded with reasons as to why and how such decisions were made. These records are maintained for a minimum of 12 months and available for

monitoring purposes by **CWCT** management or appointed staff. The monitoring and evaluation of such data is a continuous process.

9. Post Learning Destinations

All learners must have equal opportunity in preparation for leaving learning opportunities.

- a. Staff complete exit reviews
- b. Learners are consulted as to their satisfaction levels in relation to the opportunity they have received.

10. Sexual Harassment or Bullying In or Related to the Workplace

The Company's view is that it is in everyone's interests that the working environment encourages harmonious, respectful and dignified working relations between individuals and indeed all employees. This policy and procedure sets out our approach to the handling of complaints alleging sexual harassment or bullying in or associated with the workplace together with the ways in which the Company will respond.

Sexual harassment is unwanted behaviour by colleagues which is of a sexual nature and which the recipient finds objectionable. Sexual harassment may be verbal, non-verbal or physical in nature. Both men and women may be victims or perpetrators. Both are entitled to equal protection under the law and will be given equal protection by **CWCT**.

Bullying may involve forms of physical or verbal assault, harassment, oppression, persecution or intimidation. Bullying may be designed or have the effect of undermining the confidence and self-esteem of the victim. It may or may not be associated with elements of sexual harassment.

The policy of **CWCT** as regards sexual harassment or bullying is:

- **CWCT** will not tolerate sexual harassment or bullying in or associated with the workplace in any form. Allegations against an employee or learner that they have been responsible for behaviour which constitutes sexual harassment or bullying will be dealt with via the Company's published Disciplinary Procedure.

- An employee or learner concluded to have been guilty in or related to the workplace of any act of sex discrimination, harassment or bullying is liable to serious disciplinary action, which could involve dismissal.
- **CWCT's** management team will act promptly to stop any sexually offensive behaviour and will take whatever steps are necessary to prevent such behaviour happening again.
- The Company recognises that victims of sexual harassment or bullying may feel humiliated and intimidated and that it may be difficult for them to complain. Anyone who believes they have been the subject of sexual harassment will be treated sensitively. Appropriate assistance, for example counselling, will be made available in efforts to ameliorate any significant after effects or trauma associated with incidents of sexual harassment or bullying.
- **CWCT's** management team will encourage the development of a culture within the workplace which means that employees or learners will not feel threatened by instances of sexually harassing behaviour or bullying and will be able to challenge the perpetrators of such behaviour should it occur.
- The Company will ensure that offensive material (e.g. literature, photographs, cartoons, data stored images, etc.) are not displayed or circulated within the Company and that the language in common use within the workplace is not offensive to either gender.
- Each employee or learner has a duty to report any instances of sexually harassing behaviour or bullying which they witness, whether or not they themselves are the victim.

Prohibited Sexually Harassing Behaviour

An employee, learner, visitor or subcontractor must not:

- Make threats or offer inducements to a person in association with sexual advances
- Touch, hold, grab, hug, kiss or make any other unwanted physical contact.
- Stare excessively or pointedly at a person's body.
- Lean or stand exceptionally or uncomfortably close to another person.
- Use offensive language, tell offensive jokes, make personal sexual comments, suggestions or gestures.
- Circulate or display any offensive written material, images, calendars or pictures.
- Victimise any member of staff who has lodged complaints of sexual harassment.

Prohibited Bullying Behaviour

An employee, learner, visitor or subcontractor must not:

- Make verbal taunts.
- Tell hurtful jokes.
- Publicly denounce or humiliate an individual.
- Perpetrate any type of physical assault.
- Apply undue pressure or coercion to any individual.
- Withdraw co-operation from any individual or isolate them.
- Spread malicious gossip.

This list is indicative and not exhaustive.

11. Safeguarding

CWCT has a statutory and moral duty of care to safeguard and promote the welfare of all vulnerable adults and young people. By young people, we mean those under the age of 18, whilst also recognising that some adults are also vulnerable to abuse, those defined in the Safeguarding Vulnerable Groups Act 2006 as receiving support because they have physical or mental health disabilities.

CWCT recognise there are 2 main aspects to safeguarding and promoting welfare of young people and vulnerable adults. These are minimising risks and taking all appropriate actions to address concerns and actively promoting the safe learner. We will help young people and vulnerable adults to be healthy, stay safe, enjoy and achieve, make a positive contribution to the world around them and achieve economic well being.

CWCT will ensure that;

- The welfare of the learner remains paramount.
- All children and vulnerable adults whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/ or sexual identity have the right to be protected from harm.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- All staff (paid/ unpaid) working in the organisation have a responsibility to report concerns to the designated protection person identified in the Safeguarding Policy.

It is not the organisation's responsibility to decide whether abuse has taken place or not, however it will pass on information to the appropriate authority immediately.

12. Cyberbullying

Cyberbullying, like all bullying, will be taken very seriously. Cyberbullying may take different forms: threats and intimidation; harassment or "cyber stalking"(e.g. repeatedly sending unwanted texts or instant messages); vilification / defamation; exclusion or peer rejection; impersonation; unauthorized publication of private information or images.

CWCT will take steps to identify the person responsible for the bullying. Steps can include looking at the Company's system and computer logs; identifying and interviewing possible witnesses; and, with police involvement, obtaining user information from the service provider. Where the person responsible for the cyberbullying is identified the Company disciplinary procedure will be followed.

Procedure

Throughout, every effort will be made to ensure that the procedure applied is fair and confidential, respecting the rights and privacy of each individual. An employee or learner who believes that he or she has been the subject of sexually harassing or bullying behaviour should report the matter to Sally Lucas, Executive Director, or to another Director of **CWCT**.

Any allegation that sexual harassment or bullying has occurred must immediately be communicated to Sally Lucas, Executive Director or, in her absence, her nominated deputy.

An employee or learner lodging a complaint of sexual harassment or bullying may be accompanied at any stage of the process by a colleague, friend or relative of their choosing. The complainant may also request that interviews occur away from the place of work.

The Executive Director will commission an investigation relating to the allegations and circumstances as soon as practicable but in any event every effort will be made for the investigation of the complaint to begin within 24 hours. Every effort will be made for the investigation process to be completed within seven working days.

An allegation of sexual harassment or bullying made against a colleague may result in that individual being suspended from work on full pay until the outcome of any investigation and any associated disciplinary process is known. Such a suspension from work on full pay must be authorised by a Director.

Any employee or learner who is concluded following thorough investigation to have fabricated an allegation of sexual harassment or bullying against a colleague or has lied when giving evidence will themselves be subject to disciplinary action.

The Company may adopt a range of outcomes in the event that it is concluded that an employee or learner has been guilty of behaviour, which constitutes sexual harassment or bullying.

These outcomes may include, but are not restricted to, any or a combination of the following:

- The issue of apologies in respect of instances of unacceptable behaviour
- Requiring an employee or learner to enter into a binding undertaking that behaviour of specified types will not be repeated
- The issue of warnings requiring changes to behaviour
- Suspension from work or training
- Demotion
- Loss of privileges
- Transfer to another department or location
- Dismissal, with or without notice

In instances where it is concluded that sexual harassment or bullying has occurred, a disciplinary outcome of a Final Written Warning stating that any repetition will result in dismissal may be adopted without such warning having been preceded by any previous warning on the topic. Such a final written warning may well be issued without a specified time limit on the period of operation, meaning that the warning will remain in force for the remainder of the employee's service with **CWCT**, for however long that is.

Implementation Plan

The plan addresses five aims:

Aim 1:

Understand the different needs and challenges of the people engaging in learning and development across each service line.

CWCT will use market intelligence of the locality to understand the demographic make-up of the catchment area which will inform the planning and development of curriculum around each service offer.

Aim 2:

Address any difficulties people may have finding out about the project

CWCT will ensure that individuals who could benefit from the service offer have a high level awareness of its existence. This includes marketing channels – press, leaflets, social media, events, posters in local venues, word of mouth, use of community partners

All marketing and branding materials will contain appropriate messaging, including logos and reference to funding source such as ESF. Messaging will promote positive images to address potential stereotypes.

Aim 3:

Ensure that each service offer is accessible by those hardest to reach

CWCT will ensure that intended participants are able to fully participate in the most appropriate service offer. This will include:

- Completion of a needs assessment with potential participants to make sure that the provision is suitable to individual needs
- Assessment of support services needed to meet participants' childcare and other caring responsibilities, transport needs, language, communication or any other identified support need
- Assessment of reasonable adjustments required to make sure that disabled participants access the service, including the physical accessibility of premises, equipment disabled participants require and other support needs
- Assessment of support required for participants to deal with low basic skills (literacy, numeracy, IT) or out of date qualifications
- Assessment of where services are located (safe and served by public transport) and the timing of provision (consider holidays, religious festivals, office hours) to make sure that it is sufficiently flexible to meet participants' needs
- Assessment of the costs of participating (such as travel, childcare, equipment etc.) to make sure that this is not a barrier for those with the greatest needs
- Specific food and dietary needs to cater for (for cultural, religious or health reasons)
- Barriers in relation to culture, language, faith or age

Aim 4:**Ensure people's barriers are overcome and needs are met in participation**

CWCT will ensure that participants fully benefit from their engagement and that they are treated fairly. They will be informed of the equality policy and related policies such as anti-bullying and harassment. Activities will include:

- Development of personal learning plans to meet the needs of individual participants
- Gather feedback from participants to inform the service offer

Aim 5:**Ensure equalities are integrated in how the service is managed and run**

CWCT will make sure that management policies and practices fully take account of gender equality and equal opportunities. This includes:

- Equality impact assessments to make sure that services do not disadvantage certain groups of participants, particularly the hardest to reach
- Ensuring partners and subcontractors operate within **CWCT's** equality policy and action plan
- Staff, partner and subcontractor recruitment and employment policies and processes fully incorporate good practice in equalities
- Provision of support and reasonable adjustments for staff
- Equality training to ensure that staff are able to promote high levels of awareness of inclusion
- Monitoring of staff by equality characteristics

Gender Equality and Equal Opportunities Action Plan

Responsible Owner: *Operations Director*

Dates when the plan will be reviewed: *Annual Management Review*

No.	Objective	Activity	When (Quarter and Year)	Who's responsible?	Progress/ Outcomes	Follow up action required	Status	Monitoring
1.1	Ensure the location of courses is fully accessible by public transport	Check timetables against timing of courses and participant home addresses	Q4 2019	Training Manager	Amend timing of course to ensure that participant can access provision.	None		Check prior to each new set of courses
1.2	Ensure that partners operate within project equality policy and action plan	Work with partners to develop policy and action plan	Q4 2019	Operations Director	Partner support			Annual review

No.	Objective	Activity	When (Quarter and Year)	Who's responsible?	Progress/ Outcomes	Follow up action required	Status	Monitoring
1.3	Ensure the make-up of participation reflects the wider population.	<p>Quarterly monitoring of student data and report on this in the annual management review.</p> <p>Analyse student applications, enrolments across different groups.</p> <p>Develop a range of case studies.</p>	Quarterly	Operations Director	Individuals access the most appropriate learning opportunity.		Ongoing	
1.4	Ensure that services are accessed by a diverse range of organisations.	Monitor the diversity of businesses engaged with.	Annual management review	Operations Director	Marketing and promotional material reflects a diverse range of organisations.		Ongoing	
1.5	Ensure parity across achievement rates of different groups of learners by gender, ethnicity and disability.	Quarterly monitoring of success rates.	Quarterly	Operations Director	Success rates of different groups of learners is broadly similar.		Ongoing	

No.	Objective	Activity	When (Quarter and Year)	Who's responsible?	Progress/ Outcomes	Follow up action required	Status	Monitoring
1.6	Ensure that students hold high level awareness of equality and diversity	Embed E&D within curriculum design and delivery.	Q4 2019	Training Manager	All curriculum areas contain E&D reference.	Observation of teaching and learning.		
1.7	Ensure that staff are knowledgeable of E&D and how to support students in fully engaging with provision.	Undertake annual staff refresher training.	March 2019	Operations Director	Staff hold a high level of E&D awareness.	IPR reviews		